

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____	}	
UNITED STATES OF AMERICA	}	
	}	
V.	}	CRIMINAL ACTION
	}	NO. 04-10235-MLW
CORY HUBBARD	}	
DEFENDANT	}	
_____	}	

DEFENDANT'S MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS

Now comes the defendant, Cory Hubbard, in the above-captioned matter, and hereby moves this Honorable Court for leave to file such further motions relating to discovery in this case, suppression of evidence or other matters that may be appropriate, following the Court's decision on Defendant's Motion For Discovery And In The Alternative Motion For Franks Hearing.

As grounds therefore, Defendant states that although counsel has exercised due diligence in attempting to proceed with discovery, this case is such that based upon the government's response and the Court's decision, additional motions may be necessary to file.

WHEREFORE, Defendant respectfully requests that this Court allow his motion.

Respectfully submitted,

Cory Hubbard,
By his attorney,

/s/ Frank D. Camera
Frank D. Camera, Esq.
B.B.O. #635930
56 N. Main Street #321
Fall River, MA 02720
508-677-2878
508-677-2876 fax

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